

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al.

Debtors.¹

PROMESA Title III

Case No. 17-BK-3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE PUERTO RICO ELECTRIC POWER AUTHORITY,

Debtor.

Case No. 17-BK-4780-LTS

**AMENDED EXPERT DISCLOSURES OF THE AD HOC GROUP OF PREPA
BONDHOLDERS, ASSURED GUARANTY CORP., ASSURED GUARANTY
MUNICIPAL CORP., SYNCORA GUARANTEE, INC., AND U.S. BANK NATIONAL
ASSOCIATION AS PREPA BOND TRUSTEE RELATED TO
PREPA'S TITLE III PLAN OF ADJUSTMENT**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

To the Honorable United States District Court Judge Laura Taylor Swain:

Pursuant to paragraphs 3 and 25 of the Court’s March 3, 2023 *Amended and Restated Order Establishing, Among Other Things, Procedures and Deadlines Concerning Objections to Confirmation and Discovery in Connection Therewith* (the “Procedures Order”) (ECF No. 3305), the Ad Hoc Group of PREPA Bondholders (“Ad Hoc Group”), Assured Guaranty Corp. and Assured Guaranty Municipal Corp. (“Assured”), and Syncora Guarantee Inc. (“Syncora”), and U.S. Bank National Association as PREPA Bond Trustee (the “Trustee,” and collectively, “Bondholders”), respectfully submit these Opening Expert Disclosures:

EXPERT DISCLOSURES

1. Bondholders hereby disclose the identities of the following expert witnesses who may provide opinion testimony on behalf of Bondholders with respect to confirmation of the *Modified Second Amended Title III Plan of Adjustment of the Puerto Rico Electric Power Authority* (ECF No. 3296) (as it may be amended, modified, or supplemented), not including any rebuttal expert witnesses, pursuant to Federal Rule of Civil Procedure 26(a)(2)(B):

- a. Maureen M. Chakraborty, Managing Principal at Analysis Group, Inc.;
- b. Sebastian Edwards, Professor of Business Economics at the Anderson Graduate School of Management and the Henry Ford II Chair in International Management at the University of California, Los Angeles;
- c. Thomas S. Terry, CEO of The Terry Group; and
- d. Susan F. Tierney, Senior Advisor at Analysis Group, Inc.

2. Bondholders reserve the right to amend these Expert Disclosures in accordance with the Procedures Order.

WHEREFORE Bondholders respectfully request that the Court take notice of the foregoing.

We hereby certify that, on this same date, we electronically filed the foregoing with the clerk of the Court using the CM/ECF system, which will notify the attorneys of record.

Dated: San Juan, Puerto Rico
May 22, 2023

TORO COLÓN MULLET P.S.C.

/s/ Manuel Fernández-Bared

Manuel Fernández-Bared
USDC-PR No. 204,204
P.O. Box 195383
San Juan, PR 00919-5383
Tel.: (787) 751-8999
Fax: (787) 763-7760
E-mail: mfb@tcm.law

/s/ Linette Figueroa-Torres

Linette Figueroa-Torres
USDC-PR No. 227,104
E-mail: lft@tcm.law

/s/ Nayda Perez-Roman

Nayda Perez-Roman
USDC-PR No. 300,208
E-mail: nperez@tcm.law

*Counsel for the Ad Hoc Group of PREPA
Bondholders*

**KRAMER LEVIN
NAFTALIS & FRANKEL LLP**

/s/ Amy Caton

Amy Caton*
Thomas Moers Mayer*
Alice J. Byowitz*
1177 Avenue of the Americas
New York, New York 10036
Tel.: (212) 715-9100
Fax: (212) 715-8000
Email: acaton@kramerlevin.com
tmayer@kramerlevin.com
abyowitz@kramerlevin.com

Gary A. Orseck*
Matthew M. Madden*
2000 K Street NW, 4th Floor
Washington, DC 20006
Tel: (202) 775-4500
Fax: (202) 775-4510
Email: gorseck@kramerlevin.com
mmadden@kramerlevin.com

**Admitted Pro Hac Vice*

*Counsel for the Ad Hoc Group of PREPA
Bondholders*

CASELLAS ALCOVER & BURGOS P.S.C.

By: /s/ Heriberto Burgos Pérez

Heriberto Burgos Pérez
USDC-PR No. 204,809
Ricardo F. Casellas-Sánchez
USDC-PR No. 203,114
Diana Pérez-Seda
USDC-PR No. 232,014
P.O. Box 364924
San Juan, PR 00936-4924
Tel.: (787) 756-1400
Fax: (787) 756-1401
E-mail: hburgos@cabprlaw.com
rcasellas@cabprlaw.com
dperez@cabprlaw.com

*Counsel for Assured Guaranty Corp. and Assured
Guaranty Municipal Corp.*

**CADWALADER, WICKERSHAM &
TAFT LLP**

By: /s/ William J. Natbony

Howard R. Hawkins, Jr.*
Mark C. Ellenberg*
Casey J. Servais*
William J. Natbony*
Thomas J. Curtin*
200 Liberty Street
New York, New York 10281
Tel.: (212) 504-6000
Fax: (212) 406-6666
Email: howard.hawkins@cwt.com
mark.ellenberg@cwt.com
casey.servais@cwt.com
bill.natbony@cwt.com
thomas.curtin@cwt.com

**Admitted Pro Hac Vice*

*Counsel for Assured Guaranty Corp. and
Assured Guaranty Municipal Corp.*

REICHARD & ESCALERA, LLC

By: /s/ Rafael Escalara

Rafael Escalara
USDC-PR No. 122,609

/s/ Sylvia M. Arizmendi

Sylvia M. Arizmendi
USDC-PR No. 210,714

/s/ Carlos R. Rivera-Ortiz

Carlos R. Rivera-Ortiz
USDC-PR No. 303,409
255 Ponce de León Avenue
MCS Plaza, 10th Floor
San Juan, PR 00917-1913
Tel.: (787) 777-8888
Fax: (787) 765-4225
E-mail: escalara@reichardescalera.com
arizmendis@reichardescalera.com
riverac@reichardescalera.com

Counsel for Syncora Guarantee, Inc.

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

By: /s/ Susheel Kirpalani

Susheel Kirpalani*
Daniel Salinas
USDC-PR No. 224,006
Eric Kay*
51 Madison Avenue, 22nd Floor
New York, New York 10010-1603
Tel.: (212) 849-7000
Fax: (212) 849-7100
Email: susheelkirpalani@quinnemanuel.com
danielsalias@quinnemanuel.com
erickay@quinnemanuel.com

** Admitted Pro Hac Vice*

Counsel for Syncora Guarantee, Inc.

RIVERA, TULLA & FERRER LLC

/s/ Eric A. Tulla

Eric A. Tulla

USDC-DPR No. 118313

Email: etulla@riveratulla.com

Rivera Tulla & Ferrer Building

50 Quisqueya Street

San Juan, PR 00917-1212

Tel: (787)753-0438

Fax: (787)767-5784

*Counsel for U.S. Bank National
Association, in its Capacity as PREPA
Bond Trustee*

MASLON LLP

/s/ Clark T. Whitmore

Clark T. Whitmore*

Michael C. McCarthy*

John Duffey*

Jason M. Reed*

90 South Seventh Street, Suite 3300

Minneapolis, MN 55402

Tel.: (612) 672-8200

Fax: (612) 672-8397

Email: clark.whitmore@maslon.com

mike.mccarthy@maslon.com

john.duffey@maslon.com

jason.reed@maslon.com

** Admitted Pro Hac Vice*

*Counsel for U.S. Bank National
Association, in its Capacity as PREPA
Bond Trustee*